

September 30, 2002
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Anna Filutowski
RCRA Compliance Unit, WCM-126
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Subject: Response to EPA September 18, 2002 letter with comments on
Transformer PCB Investigation Plan, and Section 10.3 Meeting
Request
Boeing Plant 2, Tukwila/Seattle, Washington
EPA ID No. WAD 00925 6819
RCRA Docket No. 1092-01-22-3008(h)

Dear Ms. Filutowski:

The Boeing Company (Boeing) is in receipt of the United States Environmental Protection Agency's (EPA) letter with comments dated September 18, 2002 regarding Boeing's initial draft submittal of the *Transformer PCB Investigation Plan*. Our initial review of your comments has raised many questions and observations that must be discussed and resolved before the scope and detail of a final work plan can be contemplated. Accordingly, Boeing requests a meeting be held pursuant to Order Section 10.3 for the purpose of addressing these issues in a timely and organized manner.

We were frankly surprised at the extent and direction of Agency comments as they were in variance with Mr. Richard Albright's letter of July 5, 2002, which states "I am also informed by my staff that the submitted work plan is of excellent quality, for which I am also appreciative." Although many of EPA's comments are clear and consistent with the intent of the Transformer PCB investigation, the breadth and thrust of many other comments are, it seems to Boeing, unclear, unbounded, or not applicable given the intent of this investigation as we understand it from correspondence and meetings.

To facilitate planning in advance of meeting, we have organized the issues surfaced by your Specific Comments according to the following general categories.

Agreed in concept (in whole or in part)

Comments 1, 2, 6, 10, 11, 16, 23, 24, 25, 29 - 37, 39, 42 - 45

EPA's expectation requires clarification

Comments 3, 4, 5, 7 - 15, 17 - 21, 26, 27, 28, 38, 41, 46, 47

Potentially inconsistent with RCRA order, process, and/or record

Comments 5, 40

May exceed that necessary or specified for this transformer investigation phase

Comments 3, 7, 8, 18, 19, 20, 21, 22, 27

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September 30, 2002
To: Ms. Filutowski

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The above rough categorization is intended to initially frame the more precise dialogue that must follow between Boeing and EPA to allow finalization of the *Transformer PCB Investigation Plan* in an efficient and unambiguous manner. Comments in which Boeing believes EPA may have misinterpreted some of the plan's content are included in the 'expectations' category. Many comments shown as "agreed" will, nonetheless, benefit from collaboration with EPA's technical experts before inclusion in the final plan.



Boeing further believes that given this and other investigatory objectives relative to Jorgensen Forge property and their shoreline and associated sediments, more extensive coordination with Jorgensen Forge representatives should be undertaken as well at this time.

We look forward to meeting and resolving these issues at the earliest possible date within the thirty (30) day informal resolution period prescribed in the Order. Please do not hesitate to call or email to discuss these matters further and to select a date and venue for this important meeting.

Sincerely,

A handwritten signature in dark ink that reads "Will Ernst".

Will Ernst
Plant 2 Project Coordinator
Environmental Remediation
M/C 7A-WH, 206.655.4946, william.d.ernst@boeing.com

cc: Howard Orlean – EPA (by email)
Hideo Fujita – Department of Ecology (by email)